

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

JEROME BLIGE,)
MARSHELL BERNICE LEE,)
and the ESTATE OF SAUDI)
ARAI LEE, by and through)
MARSHELL BERNICE LEE, its)
Administrator,)

VERSUS) **CIVIL ACTION NO.: 4:24-cv-00131-RSB-CLR**

)
ERNEST FERGUSON,) **JURY TRIAL DEMANDED**
IN HIS INDIVIDUAL CAPACITY;)
MACKENZIE RANDLE, IN HIS)
INDIVIDUAL CAPACITY;)
CITY OF SAVANNAH)

Exhibit C

Indictment No. SPCR24-028160-J1
22CHM03409/
In the Superior Court of Chatham County, State of Georgia
September Term, 2024

THE STATE OF GEORGIA

OFFENSE(S): FELONY MURDER, ET. AL.

VERSUS
ERNEST FERGUSON

WITNESS(ES):
Tracy Sands, Georgia Bureau of Investigation
Region 5 (Statesboro)
Alan Sammons, Investigator, District Attorney

Shalena Cook Jones
District Attorney
Eastern Judicial Circuit
of Georgia

LYLE BURNHAM
ASSISTANT DISTRICT ATTORNEY

True BILL
September 25, 2024
[Signature]
FOREPERSON

Returned in open court this 25th day of
September, 2024

[Signature]
(Deputy) Clerk, Superior Court of
Chatham County, Georgia

Filed in office this 25th day of
September, 2024

[Signature]
(Deputy) Clerk, Superior Court of
Chatham County, Georgia

Defendant, on _____ being in open court, pleads _____

Defendant Attorney for Defendant

Defendant, on _____ being in open court, PLEADS GUILTY and waives the right to trial by jury; the presumption of innocence; the right to confront witnesses against oneself; the right to subpoena witnesses; the right to testify and to offer other evidence; the right to assistance of counsel during trial; the right not to incriminate oneself; and understands that by pleading not guilty or remaining silent and not entering a plea, one obtains a jury trial.

Defendant Attorney for Defendant

We, the Jury, find the defendant

THUMBPRINT(S) OF DEFENDANT
(left) (right)

FOREPERSON _____ DATE _____

STATE OF GEORGIA, COUNTY OF CHATHAM

BILL OF INDICTMENT

IN THE SUPERIOR COURT OF SAID COUNTY,

THE GRAND JURORS selected, chosen and sworn for the County of Chatham to wit:

- | | |
|-----------------------------|-----------------------------|
| 1. Diana Hughes, Foreperson | |
| 2. Mark Dana | 15. Yolonda Washington |
| 3. Cathlin Sass | 16. Amy Shackleford |
| 4. Mary Ann Goldwire | 17. Betty Day |
| 5. Diane Deering | 18. Bryonna Jones |
| 6. Jeremiah Holland | 19. Anne Warhola |
| 7. Jacob Allen | 20. Mark Greene |
| 8. Shannon Johnson | 21. Brad Hook |
| 9. Lisa Harmon | 22. Cynthia Johnson |
| 10. Gloria Bryant Lonon | 23. Julius Wilson |
| 11. Kalie Mutter | 24. |
| 12. Joy Walker | 25. |
| 13. Daunte Graves | 26. |
| 14. Tracy Young | |

COUNT 1: FELONY MURDER, O.C.G.A. 16-5-1(c)

in the name of and on behalf of the citizens of the State of Georgia, charge and accuse ERNEST FERGUSON, with the offense of FELONY MURDER, for that the said ERNEST FERGUSON, in the County of Chatham and State of Georgia, on or about the 24th day of June, 2022, while in the commission of the offense of AGGRAVATED ASSAULT IN COUNT 4, a felony, did cause the death of SAUDI LEE, a human being, by SHOOTING SAUDI LEE, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 2: FELONY MURDER, O.C.G.A. 16-5-1(c)

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse ERNEST FERGUSON, with the offense of FELONY MURDER, for that the said ERNEST FERGUSON, in the County of Chatham and State of Georgia, on or about the 24th day of June, 2022, while in the commission of the offense of AGGRAVATED BATTERY IN COUNT 5, a felony, did cause the death of SAUDI LEE, a human being, by SHOOTING SAUDI LEE, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 3: FELONY MURDER, O.C.G.A. 16-5-1(c)

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse ERNEST FERGUSON, with the offense of FELONY MURDER, for that the said ERNEST FERGUSON, in the County of Chatham and State of Georgia, on or about the 24th day of June, 2022, while in the commission of the offense of FALSE IMPRISONMENT IN COUNT 6, a felony, did cause the death of SAUDI LEE, a human being, by SHOOTING SAUDI LEE, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 4: AGGRAVATED ASSAULT, O.C.G.A. 16-5-21

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse ERNEST FERGUSON, with the offense of AGGRAVATED ASSAULT, for that the said ERNEST FERGUSON, in the County of Chatham and State of Georgia, on or about the 24th day of June, 2022, did make an assault upon the person of SAUDI LEE with a deadly weapon, to wit: A ELECTRONIC CONTROL DEVICE AND A HANDGUN by DRAWING AND BRANDISHING AN ELECTRONIC CONTROL DEVICE AND A HANGUN TO SAUDI LEE., contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 5: AGGRAVATED BATTERY, O.C.G.A. 16-5-24

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse ERNEST FERGUSON, with the offense of AGGRAVATED BATTERY, for that the said ERNEST FERGUSON, in the County of Chatham and State of Georgia, on or about the 24th day of June, 2022, did maliciously cause bodily harm to SAUDI LEE by seriously disfiguring said person's body by SHOOTING SAUDI LEE IN THE BACK, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 6: FALSE IMPRISONMENT, O.C.G.A. 16-5-41

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse ERNEST FERGUSON, with the offense of FALSE IMPRISONMENT, for that the said ERNEST FERGUSON, in the County of Chatham and State of Georgia, on or about the 24th day of June, 2022, in violation of the personal liberty of SAUDI LEE, did unlawfully detain SAUDI LEE without legal authority, contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 7: MAKING A FALSE STATEMENT, O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse ERNEST FERGUSON, with the offense of MAKING A FALSE STATEMENT, for that the said ERNEST FERGUSON, in the County of Chatham and State of Georgia, on or about the 24th day of June, 2022, knowingly and willfully make A NARRATIVE IN SUPPLEMENT 16 OF SAVANNAH POLICE DEPARTMENT CRIME REPORT 220624050, a false writing, knowing said document contained a false statement, in THE INVESTIGATION OF AN OFFICER INVOLVED SHOOTING OF SAUDI LEE, a matter within the jurisdiction of SAVANNAH POLICE DEPARTMENT, a agency of THE CITY OF SAVANNAH government, by STATING IN HIS NARRATIVE OF HIS INVOLVEMENT WITH SAUDI LEE ON JUNE 24TH, 2022 THAT PRIOR TO RUNNING AWAY FROM ERNEST FERGUSON SAUDI LEE POINTED HIS HANDGUN AT ERNEST FERGUSON. , contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.

COUNT 8: MAKING A FALSE STATEMENT, O.C.G.A. 16-10-20

And the jurors aforesaid, in the name of and on behalf of the citizens of the State of Georgia, further charge and accuse ERNEST FERGUSON, with the offense of MAKING A FALSE STATEMENT, for that the said ERNEST FERGUSON, in the County of Chatham and State of Georgia, on or about the 1st day of July, 2022, knowingly and willfully make a false statement to SPECIAL AGENT TRACY SANDS in GEORGIA BUREAU OF INVESTIGATION INVOLVING THE INVESTIGATION OF THE SHOOTING DEATH OF SAUDI LEE, a matter within the jurisdiction of GEORGIA BUREAU OF INVESTIGATION, a agency of state government, to wit: STATING THAT PRIOR TO TURNING AND RUNNING AWAY FROM ERNEST FERGUSON SAUDI LEE POINTED HIS FIREARM AT ERNEST FERGUSON., contrary to the laws of the State of Georgia, the good order, peace and dignity thereof.



SHALENA COOK JONES
DISTRICT ATTORNEY
EASTERN JUDICIAL CIRCUIT
OF GEORGIA